

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 6:19-CR-56
v.	§	
	§	
PAMELA SUE HANNAN (01)	§	

**ELEMENTS OF THE OFFENSE**

COMES NOW, the United States of America, by and through the United States Attorney for the Eastern District of Texas, and files this pleading summarizing the elements of the offense to which the defendant intends to enter a plea of guilty to Count One of the information:

Title 18, United States Code, Section 371 makes it a crime for anyone to conspire with someone else to commit an offense against the laws of the United States.

To establish that the defendant is guilty of conspiracy, the government must prove the following beyond a reasonable doubt:

*First:* That the defendant and at least one other person made an agreement to commit the crime of operating an unlicensed money transmitting business, as charged in the information;

*Second:* That the defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose; and

*Third:* That one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the information, in order to accomplish some object or purpose of the conspiracy.

“Unlicensed money transmitting business” means a money transmitting business which affects interstate or foreign commerce in any manner or degree and –

- (A) is operated without an appropriate money transmitting license in a State where such operation is punishable as a misdemeanor or a felony under State law, whether or not the defendant knew that the operation was required to be licensed or that the operation was so punishable;
- (B) fails to comply with the money transmitting business registration requirements under section 5330 of title 31, United States Code, or regulations prescribed under such section; or
- (C) otherwise involves the transportation or transmission of funds that are known to the defendant to have been derived from a criminal offense or are intended to be used to promote or support unlawful activity

Respectfully submitted,

STEPHEN J. COX  
UNITED STATES ATTORNEY

/s/ Nathaniel C. Kummerfeld  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Elements of the Offense was served on counsel of record for defendant via the court's CM/ECF on this the 8th day of June, 2020.

/s/ Nathaniel C. Kummerfeld

Nathaniel C. Kummerfeld